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DUDLEY RIDGE WATER DISTRICT

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September 14, 1999

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SUBJECT: Comments on Draft Programmatic EIS/EIR

Ladies and Gentlemen:

Dudley Ridge Water District is a 37,000 acre agricultural water district that has only one water supply... a water service contract with the State Water Project (SWP). The District, or its landowners, has no local surface water or groundwater supplies. Growers in the District have focused on farming high-value permanent crops (pistachios, almonds, peaches, apricots, pomegranates, cherries and grapes). The scarcity and value of water to District growers has resulted in major capital investments in highly-efficient irrigation systems... both on-farm and District-wide. All permanent crops are irrigated with low-volume microsprinklers or drip irrigation systems. Each of these crops receive metered District water from concrete-lined canals or underground pipelines. On-farm, irrigation system specialists and modern equipment are used to manage and monitor each irrigation.

Farmers in the District are extremely concerned that for water users relying on Delta exports. CalFed has not made good on its promise for all factions and regions "to get better together". The CalFed program provides guaranteed improvements for fish...but only future promises for water users (i.e., people). With the Bay-Delta Accord, water users south of the Delta have lost more than 1,000,000 acre-feet of water supply from the Delta. The CalFed program was committed to not only recover those lost water supplies, but increase the water supply beyond the pre-Accord level. What has happened to that commitment?

The program presented in the Draft Programmatic EIS/EIR indicates that Delta exports could be reduced an additional 700,000 acre-feet. To say the least, not only farmers in Dudley Ridge Water District (who rely entirely on water from the Delta), but all surface water and

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groundwater users that have built economies based on contracted "project" water supplies from the Delta are being short-changed by the CalFed program! Other "non-project" urban and agricultural water users that overlie groundwater basins are also victims, as water reductions from the Delta will increase groundwater pumping from many already overdrafted groundwater basins.

Please...restore the equity in your program that was initially promised! A reliable supply doesn't mean much if the quantity being delivered to the water user keeps diminishing!

Respectfully,

Joseph C. MacIlvaine, President